

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

\_\_\_\_ Division

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Jeffrey Michael Slama Hastings

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

d/s Russell

The Palm Beach County Sheriff's Office

Defendant(s)

et, AL

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

FILED BY NC D.C.

FEB 05 2024

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - W.P.B.

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

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**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Jeffrey Michael Slama Hastings  
 Address 8862 Estate dr.  
West Palm Beach FL 33411  
City State Zip Code  
 County Palm Beach County  
 Telephone Number 561 708 2968  
 E-Mail Address notpbso@proton.me

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name d/s Russell  
 Job or Title (if known) deputy sheriff  
 Address 3228 gun club rd.  
West Palm Beach FL 33406  
City State Zip Code  
 County Palm Beach County  
 Telephone Number 561 688 3000  
 E-Mail Address (if known) \_\_\_\_\_

☐ Individual capacity ☒ Official capacity

**Defendant No. 2**

Name The Palm Beach County Sheriffs Office  
 Job or Title (if known) \_\_\_\_\_  
 Address 3228 gun club rd.  
W.P.B. FL 33406  
City State Zip Code  
 County \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 E-Mail Address (if known) \_\_\_\_\_

☐ Individual capacity ☒ Official capacity

## Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

## Defendant No. 3

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity
 ☐ Official capacity

## Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity
 ☐ Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

my 1<sup>st</sup> and 4<sup>th</sup> Amendment rights were violated.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

d/s Russell was responding to a call about a suspicious person from Sgt. Hiden # 7390 from Pbsco corrections had seen someone he thought was suspicious on county property.

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

3228 gun club rd. West Palm Beach FL. 33

- B. What date and approximate time did the events giving rise to your claim(s) occur?

11:17 am on 2-2-24

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?) I was at the Palm Beach County jail gathering content for my YouTube channel Sgt. Hiden reported then saying I needed a appointment to be there filming. which is protected by the 1st Amendment. d/s Russell responded and after telling me how due to policies of the Sheriffs office, I would be being arrested if I did not leave even with me informing d/s Russell of The United States Constitution and me being a citizen who has rights. He states in his PCA "Mr Hastings continued to make statements regarding his rights as a citizen." I told d/s Russell I had been falsley imprisoned in the moldy jail before and I would be opening new litigation against him for my violating my rights I was trying to tell him about, he did not care as his PCA clearly shows. d/s Russell arrested me for trespassing after warning

## IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Lucky for me I was smart enough to stop and say I am not resisting if I'm being detained or arrested d/s Russell and a unknown deputy who refused to identify both grabbed and cuffed me in torture cuffs to kidnap me for what they claimed was trespassing after warning. However this was a violation of my rights to arrest me and illegally search me for filming on county property. In violation of my 1st and 4th Amendment rights protected by the U.S.

## V. Relief

Constitution. There is video of this whole incident clear, colorful, video as well as audio from start to finish.

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes.

If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I would like the Sheriff's office to apologize for their repeated poor behavior towards me. I would also like for them to stop violating my rights that are protected by the United States Constitution. Due to the emotional distress, damage to my reputation, repeatedly and constantly I would like \$1,000,000 for my continued pain and suffering.

Also most importantly I would like for the Sheriff's office to accept some help from me and a qualified professional of my choosing to get their officers trained better. I am unsure how to best get these deputies trained better, However I'm sure since this continues to happen some outside help would be best at this point for the Palm Beach County Sheriff's office as well as my community and myself. Thank you for your time with this tragedy I am currently dealing with.

I would also like d/s Russell to apologize for adding insult to injury by ~~and~~ calling me a Muslim in his PCA, dated 2-2-24.

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2-5-24

Signature of Plaintiff

Printed Name of Plaintiff

Jeffrey Hastings  
Jeffrey Michael Slama Hastings

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address